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Attorneys for Defendant

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF OREGON
EUGENE DIVISION**

UNITED STATES OF AMERICA,

Plaintiff,

v.

PIROUZ SEDAGHATY,

Defendant.

CR 05-60008

**MOTION TO AMEND PROTECTIVE
ORDER OF DECEMBER 18, 2007**

Defendant, Pirouz Sedaghaty, through his attorneys, Federal Public Defender Steven T. Wax, and Lawrence Matasar, hereby moves this Court to modify the conditions of release and protective order relating to discovery (CR 77) in the following manner.

As the Court is aware, the trial date is rapidly approaching. As a result, the intensity of communication between attorney and client and need for intense client review of case materials has increased substantially. One of the conditions of the protective order is currently impeding the ability of Mr. Sedaghaty to participate as effectively as possible in his defense. We, therefore, request the following modification:

Permission for Mr. Sedaghaty to remove discovery material from the office of the Federal Public Defender for review at his home. Such removal and review would remain subject to all other conditions that preclude his copying, disseminating, or showing the discovery material to any other person (with the exception of his wife, Summer Rife). Given the volume of material and defense utilization of data bases, we would provide the discovery in multimedia form on a laptop computer that is not and will not be connected to the internet and on which Pre-Trial Services would place software to ensure no internet use.

Respectfully submitted this 19th day of March, 2010.

/s/ Steven T. Wax
Steven T. Wax
Federal Public Defender

/s/ Lawrence Matasar
Lawrence Matasar